

COPY

(11)

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

OLIVER STEVENSON, JR.,	:	
Plaintiff	:	CIVIL NO. 1:CV-00-0274
	:	
v	:	(Kane, J.)
	:	
WILLIAM J. HENDERSON,	:	
POSTMASTER GENERAL, UNITED	:	
STATES POSTAL SERVICE,	:	
Defendants	:	

FILED  
SCRANTON

MAR 15 2002

PER   H    
DEPUTY CLERKMOTION TO EXTEND THE CASE MANAGEMENT ORDER

Defendant, William J. Henderson by and through his counsel, Matthew E. Haggerty, Assistant United States Attorney, United States Attorney's Office for the Middle District of Pennsylvania, hereby moves your honorable Court for an extension of all deadlines contained in the November 20, 2001 Case Management Order for forty-five (45) days. In support of this Motion the Defendant avers as follows:

1. On November 20, 2001, Your Honor handed down a Case Management Order setting certain deadlines for this case. As part of that Order Your Honor ordered March 15, 2002, to be the close of fact discovery.
2. In the last few months counsel for the Defendant has been in the process of obtaining fact discovery through Interrogatories and has received information from the Plaintiff in response to those Interrogatories.
3. In the past few weeks counsel has been reviewing the information that has been provided by the Plaintiff.
4. Counsel is requesting this forty-five (45) day extension

of the Case Management Order because he has spent the past two weeks preparing briefs in three cases before the United States Court of Appeals for the Third Circuit. Counsel certifies that he has prepared briefs in Suarez-Maya v. Mendez, Appeal No. 01-4311, Saccoccia v. Warden, USP Lewisburg, Appeal No. 01-1144, and Menachem PriHar v. Zenk, Appeal No. 01-4368.

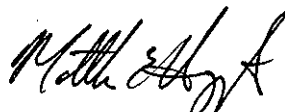
5. As a result of these deadlines, counsel has been unable to schedule the deposition of the Plaintiff and is requesting this extension so that he may have time to do so. Counsel will schedule the Plaintiff's deposition upon receipt of the Court's Order authorizing this extension of time.

6. Because Plaintiff is proceeding pro se, the undersigned has not contacted him for his concurrence or non-concurrence in this matter pursuant to M.D. Pa. Local Rule 7.1.

WHEREFORE, Defendant William J. Henderson respectfully requests your Honorable Court to enter the attached Order extending the case management deadlines for forty-five days.

Respectfully submitted,

MARTIN C. CARLSON  
United States Attorney



MATTHEW E. HAGGERTY  
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

OLIVER STEVENSON, JR.,	:	
Plaintiff	:	CIVIL NO. 1:CV-00-0274
	:	
v	:	(Kane, J.)
	:	
WILLIAM J. HENDERSON,	:	
POSTMASTER GENERAL, UNITED	:	
STATES POSTAL SERVICE,	:	
Defendants	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

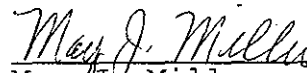
This 15th day of March, 2002, she served a copy of the attached

**MOTION TO EXTEND THE CASE MANAGEMENT ORDER**

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place(s) and address(s) stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Scranton, Pennsylvania.

ADDRESSEE(S)

Oliver Stevenson, Jr.  
17 Ash Street  
Mont Alto, PA 17237-9645

  
\_\_\_\_\_  
May J. Miller  
Legal Assistant